

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ANGELICA JUNIOUS,

Plaintiff,

v.

W. BAKER, et al.,

Defendants.

No. 1:22-cv-03681

Judge Edmond E. Chang

Magistrate Judge Maria Valdez

**MOTION TO JOIN DEFENDANTS' MOTION TO STAY AND DEFENDANTS'  
RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED  
COMPLAINT AND FOR OTHER MISCELLANEOUS RELIEF**

Defendant Sgt. William Baker ("Sgt. Baker"), by his attorney, Kimberly M. Foxx, State's Attorney of Cook County, through her Assistant State's Attorney, Miguel E. Larios, and for his Motion to Join Defendants' Motion to Stay (dkt. 104) and Defendants' Response to Plaintiff's Motion for Leave to File an Amended Complaint and For Other Miscellaneous Relief (dkt. 103), states as follows:

1. On August 14, 2023, undersigned counsel was assigned to represent Sgt. Baker and filed his appearance that same day. (Dkt. 96).
2. On August 18, 2023, Defendants (other than Sgt. Baker) filed a motion to stay pursuant to the abstention doctrine established by *Younger v. Harris*, 401 U.S. 37 (1971) (dkt. 104), and also filed their response to Plaintiff's Motion for Leave to File an Amended Complaint and For Other Miscellaneous Relief (dkt. 103).
3. Sgt. Baker seeks to join the legal arguments set forth in Defendants' motion to stay pursuant to *Younger*. (Dkt. 104).

4. Because undersigned counsel was not involved in the case until four (4) days ago, he has no direct knowledge of the factual background or procedural posture set forth in the motion to stay, Sgt. Baker therefore seeks to join as to the legal arguments only.

5. Sgt. Baker also seeks to join in Defendants' response to Plaintiff's motion for leave to file an amended complaint and for other miscellaneous relief. (Dkt. 103).

6. No party will be prejudiced by the granting of this motion.

**WHEREFORE**, Defendant Sgt. William Baker respectfully requests that this Honorable Court: (1) grant him leave to join the legal arguments set forth in Defendants' motion to stay, (2) grant him leave to join Defendants' response to Plaintiff's motion for leave to amend and for miscellaneous relief, and (3) grant such other relief that this Court deems just.

Dated: August 18, 2023

Respectfully submitted,

**KIMBERLY M. FOXX**  
State's Attorney of Cook County

/s/ Miguel E. Larios

Miguel E. Larios  
Cook County State's Attorney's Office  
Conflicts Counsel Unit  
50 West Washington Street, Suite 2760  
Chicago, Illinois 60602  
(312) 603-1427  
miguel.larios@cookcountyil.gov

*Counsel for Defendant Sgt. William Baker*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 18, 2023, he filed the foregoing document using the CM/ECF e-filing system with the Clerk of the Court for the United States District Court for the Northern District of Illinois, which will notify counsel of record of this electronic filing.

*/s/ Miguel E. Larios*